

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE:)	CHAPTER 7
)	
Cornerstone Enterprises of Greenwood, Inc.,)	Case No. 17-03127-hb
)	
Debtor,)	
)	
_____)	Adversary No. 18-80027-hb
John K. Fort, Trustee,)	
)	
Plaintiff,)	PLAINTIFF'S MOTION FOR
)	SUMMARY JUDGMENT
vs.)	
)	
Earl Brewington,)	
)	
Defendant.)	
_____)	

TO: ALECIA T. COMPTON, ATTORNEY FOR DEFENDANT:

PLEASE TAKE NOTICE that the Plaintiff, by and through his undersigned counsel, will move before the presiding judge of the United States Bankruptcy Court for the District of South Carolina, at a date and time to be set by the Court, but not sooner than ten (10) days after service hereof, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment in Plaintiff's favor against the Defendant, for the reason that there is no genuine dispute as to any material fact and Plaintiff is entitled to Judgment as a matter of law.

The Motion is based upon the Memorandum of Law filed contemporaneously herewith.

We certify that consultation with opposing counsel or party would serve no useful purpose.

(Signature page follows)

Respectfully submitted,

ROE CASSIDY COATES & PRICE, P.A.

/s/Joshua J. Hudson

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